

Exhibit 6

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IN THE UNITED STATES COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION

OPiate Litigation, MDL No. 2804

Case No. 17-md-2804

Judge Dan Polster

This document relates to:

The County of Summit, Ohio et al. v.

Purdue Pharma L.P., et al.

Case No. 17-OP-45004

The County of Cuyahoga v.

Purdue Pharma L.P., et al.

Case No. 18-OP-45090

City of Cleveland, Ohio v.

Purdue Pharma L.P., et al.

Case No. 18-OP-45132

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VIDEOTAPED DEPOSITION OF VINCENT CARAFFI

Wednesday, January 23, 2019, at 9:07 a.m.

Cleveland, Ohio

Reported by:

Paula Raskin, CSR-4757

Ref. No. 3202797

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3 On Wednesday, November 19, 2018,
4 commencing at approximately 9:07 a.m., the
5 videotaped deposition of VINCENT CARAFFI, taken
6 by Counsel for the Defendants, was held at the
7 offices of Kelley & Ferraro, Ernst & Young
8 Tower, 950 Main Avenue, Suite 1300, Cleveland,
9 Ohio, before and stenographically reported by
10 Paula S. Raskin, CSR-4757, Notary Public.

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10		and Annie Dunham	
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MR. SMITH: Objection; form.

A. Based upon my conversations with other individuals who would be able to answer that question, whether it be data, whether it be information based upon the increase in service providers as individuals who needing treatment, I can't answer that question.

My role as a chair of the Cuyahoga County Board of Health is to facilitate a local collaborative. I do not have a background in substance abuse. I can't answer that question.

Q. Mr. Caraffi, I'm not asking you to be an expert. I'm asking you factual knowledge that you have had and have here today, so I want to be very clear about that.

A. I understand.

Q. And we know that you were the chair of the Cuyahoga County Opiate Task Force, right?

A. Correct.

Q. And you took that position in 2010, right?

A. Correct.

Q. And over the course of the years that you've been in that position, you've presented on the nature and scope of the opiate -- opiate

1 MR. SMITH: Objection; form.

2 A. I don't recall a specific date.

3 Q. You don't need to identify a specific
4 date. That would be really hard, if not
5 impossible.

6 Can you generally say when you first
7 recall having heard that the worrisome trends
8 that we've talked about earlier today related to
9 abuse of opioids and overdoses might have been
10 driven by the increased prescribing by licensed
11 physicians of prescription opioid medications?

12 MR. SMITH: Objection; form.

13 A. 2009 report from the Ohio Department
14 of Health.

15 Q. Do you remember the name of that
16 report?

17 MR. SMITH: Objection; form.

18 A. I do not off the top of my head.

19 Q. Does the Cuyahoga County Board of
20 Health prepare and issue to the public an annual
21 report?

22 MR. SMITH: Objection; form.

23 A. An organizational annual report, yes,
24 it does.

25 Q. For how long has the Cuyahoga County

1 spelling and grammar, would you have reviewed
2 this section for substantive content and
3 accuracy?

4 MR. SMITH: Objection; form.

5 A. Yes.

6 Q. This 2010 annual report indicates
7 that there was an alarming trend in Ohio -- I'm
8 looking in the very first sentence.

9 A. Uh-huh.

10 Q. -- in terms of an increase in
11 prescription drug abuse and overdose. Do you
12 see that?

13 A. I do.

14 Q. And then it references this campaign
15 that we talked about earlier, "Prescription for
16 Prevention: Stop the Epidemic." Do you see
17 that?

18 A. I do.

19 Q. Is that an Ohio Department of Health
20 campaign?

21 MR. SMITH: Objection; form.

22 A. Yes.

23 Q. Did Cuyahoga County Board of Health
24 have some role with respect to the Ohio
25 Department of Health campaign entitled

1 "Prescription for Prevention: Stop the
2 Epidemic"?

3 A. Yes.

4 Q. What was CCBH's role with respect to
5 this particular campaign?

6 MR. SMITH: Objection; form.

7 A. I mentioned to you earlier it was the
8 relationship with ODH and I think it was
9 FleishmanHillard to create awareness in Cuyahoga
10 County about the possibilities or which
11 currently taking place in Ohio as it related to
12 the opioid epidemic.

13 Q. It's obviously referenced in a 2010
14 report.

15 Do you know if this campaign had
16 already been launched prior to 2010?

17 A. Yes. This -- we talked about this
18 morning it was 2009 or 2010 when the
19 Prescription for Prevention came out.

20 Q. With respect to the term "epidemic"
21 that is in the title of this campaign, what is
22 your understanding about what the word
23 "epidemic" refers to in this context?

24 A. I would say an increase in morbidity
25 or mortality related to infectious disease or